

***IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO***

IN RE:

KAREN BARRETO CRUZ

DEBTOR(S)

CASE NO.: 19-06490

CHAPTER 13

ANSWER TO ORDER UNDER LOCAL RULE 3015

TO THE HONORABLE COURT:

Come(s) debtor(s) represented by the undersigned attorney and most respectfully EXPOSE(S) and PRAY(S):

1. Upon Chapter 13 Trustee's unfavorable Recommendation dated January 21, 2020 there were some issues raised regarding the proposed Chapter 13 Plan.

2- The issues raised have been directed as follows

a- An amended Plan was filed to include arrears to Scotiabank without the alternative of Loss mitigation previously requested

b. Amended Schedules I and J were filed to reflect the payment of the homeowners association

c- Evidence of income for CERIDIAN and CCRES for the period Oct. 25 and Sept. and Oct. respectively were previously submitted.

29/1/2020

Chapter 12 & 13 :: Trustee Electronic Document Filing Application (TEDFA)

Case Code	Description	Original File Name	Final File Name	UploadDate
1906490	Taxes - Income Tax Returns	2018 W-2.pdf	1906490-1189573132_805.pdf	1/29/2020
1906490	Taxes - Income Tax Returns	CERIDIAN 11-01-2019.pdf	1906490-806822698_805.pdf	1/29/2020
1906490	Taxes - Income Tax Returns	TALONARIO CCRES 08-02-08-23.pdf	1906490-628168048_805.pdf	1/29/2020

d- Regarding the 2018 1040 PR tax return debtor informs that she did not received any taxable income in Puerto Rico witch required the filing of this Return. A sworn statement will be submitted accordingly.

3- The only issue pending would be the lack of proof of claim for the Asociacion de Condomines for Playa de Hucares. Debtor and the undersigned attorney have requested in multiple instances from this creditor the filing of this Claim with no avail. If not filed debtor will request to this Honorable Court authorization to file such proof of claim according to local Bankruptcy Rules.

WHEREFORE, Debtor(s) respectfully request(s) to this Honorable Court to take notice of the aforementioned.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF System which will send notification of such filing to the parties registered in the CM/ECF System. All other parties have been notified by the United States Postal mailing service.

RESPECTFULLY SUBMITTED.

In Caguas, Puerto Rico, on February 5, 2020.

/s/ JOSÉ Á. LEÓN LANDRAU, ESQ.
JOSÉ Á. LEÓN LANDRAU (131506)
Attorney for Debtor(s)
PO Box 1687
Caguas, PR 00726
Phone: (787) 746-7979
Fax: (787) 961-9348
jleonlandrau@yahoo.com